



April 7, 2017

California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: Volkswagen's California ZEV Investment Plan: Cycle 1

Dear California Air Resources Board Members and Staff,

We appreciate the opportunity to provide comments on the Volkswagen's (VW) California ZEV Investment Plan: Cycle 1.

Green Commuter strongly supports the proposed investment for a Green City Initiative in Sacramento and respectfully requests ARB to consider Los Angeles as a second Green City site. Green Commuter, a minority-woman-owned Benefit Corporation headquartered in California, has developed an innovative system that utilizes a fleet of 100% zero-emission vehicles (ZEV) to provide a combined service of vanpool, car sharing and/or fleet replacement to maximize efficiency, decrease the cost of commuting, and increase ZEV access for all consumers in California. The Green Commuter model operates vanpool vehicles as public car share and/or fleet replacement vehicles during non-commute hours. This integrated approach reduces costs and increases benefits—reducing emissions, alleviating traffic and parking issues.

Green Commuter strongly supports the inclusion of investment in zero-emission car-sharing services as a part of the Green City Initiative to increase ZEV access and awareness. Green Commuter requests including zero-emission vanpool services, in addition to car-sharing and delivery services, to increase zero-emission mobility options along with ZEV awareness and education. All-electric vanpooling bridges the access gap to ZEV between typical EV owners (average annual income of more than \$100,000) and low to mid income earners by offering safe, attractive EVs for commuting purposes at a lower cost. Increasing awareness and access for more Californians to ride in an EV will help California reach the State's ZEV deployment and air quality goals, including the Governor's ZEV Action Plan, SB 350, SB 1275, and SB 535.

Thank you for the opportunity to provide comments on the VW Consent Decree Appendix C. We look forward to continuing to work together to carry out the goals and initiatives of increasing public exposure and access to zero-emission vehicles for consumers in California.

Kind Regards,


Gustavo Occhiuzzo
CEO



Leslie Graham
Director of Grants and Partnerships

Cc: La Ronda Bowen, Ombudsman